

United States District Court
Southern District of Texas
FILED

DEC 09 2015

David J. Bradley, Clerk of Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION



UNITED STATES OF AMERICA §

v. §

JOHN JACOB LAVERGNE; §
SHAWNA NICOLE ENLOE; §
THEA RAE SONNIER; and §
ASHLEY DAFFT §

Criminal No.

15 CR 653

UNDER SEAL

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Conspiracy to Possess with Intent to Distribute Methamphetamine

From on or about April 1, 2015, and continuously thereafter, up to and on or about the present date, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendants,

**JOHN JACOB LAVERGNE,
SHAWNA NICOLE ENLOE,
THEA RAE SONNIER, and
ASHLEY DAFFT,**

did knowingly, unlawfully and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to possess with the intent to distribute a controlled substance, that is fifty (50) grams or more

methamphetamine and five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TWO

Possession with Intent to Distribute Methamphetamine

On or about May 13, 2015, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendants,

**JOHN JACOB LAVERGNE and
SHAWNA NICOLE ENLOE,**

aiding, abetting and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully and intentionally attempt to possess with intent to distribute a controlled substance, that is fifty (50) grams or more methamphetamine and five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT THREE

Possession with Intent to Distribute Methamphetamine

On or about May 29, 2015, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendants,

**JOHN JACOB LAVERGNE and
SHAWNA NICOLE ENLOE,**

aiding, abetting and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully and intentionally attempt to possess with intent to distribute a controlled substance, that is fifty (50) grams or more methamphetamine and five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FOUR

Possession with Intent to Distribute Methamphetamine

On or about June 16, 2015, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendant,

JOHN JACOB LAVERGNE,

aiding, abetting and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully and intentionally attempt to possess with intent to distribute

a controlled substance, that is fifty (50) grams or more methamphetamine and five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FIVE

Possession with Intent to Distribute Methamphetamine

On or about June 16, 2015, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendant,

JOHN JACOB LAVERGNE,

aiding, abetting and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully and intentionally attempt to possess with intent to distribute a controlled substance, that is fifty (50) grams or more methamphetamine and five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT SIX

Possession with Intent to Distribute Methamphetamine

On or about June 27, 2015, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendant,

SHAWNA NICOLE ENLOE,

aiding, abetting and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully and intentionally attempt to possess with intent to distribute a controlled substance, that is fifty (50) grams or more methamphetamine and five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT SEVEN

Possession with Intent to Distribute Methamphetamine

On or about September 3, 2015, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendants,

**JOHN JACOB LAVERGNE and
ASHLEY DAFFT,**

aiding, abetting and assisting others known and unknown to the Grand Jury, did

knowingly, unlawfully and intentionally attempt to possess with intent to distribute a controlled substance, that is five (5) grams or more methamphetamine and fifty (50) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT EIGHT

Possession with Intent to Distribute Methamphetamine

On or about September 7, 2015, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendants,

**JOHN JACOB LAVERGNE and
THEA RAE SONNIER,**

aiding, abetting and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully and intentionally attempt to possess with intent to distribute a controlled substance, that is fifty (50) grams or more methamphetamine and five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT NINE

Possession with Intent to Distribute Methamphetamine

On or about September 11, 2015, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendants,

**JOHN JACOB LAVERGNE and
THEA RAE SONNIER,**

aiding, abetting and assisting others known and unknown to the Grand Jury, did knowingly, unlawfully and intentionally attempt to possess with intent to distribute a controlled substance, that is fifty (50) grams or more methamphetamine and five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TEN

Possession of a Firearm and Ammunition by a Convicted Felon

On or about April 29, 2015, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendant,

JOHN JACOB LAVERGNE,

aiding, abetting, and assisting others known and unknown to the Grand Jury,

having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce, a firearm, to wit, a .45 Kimber handgun, and ammunition, to wit approximately seven (7) rounds of .45 caliber ammunition, which had been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2), and Title 18, United States Code, Section 2.

COUNT ELEVEN

Possession of a Firearm and Ammunition by a Convicted Felon

On or about June 16, 2015, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendant,

JOHN JACOB LAVERGNE,

aiding, abetting, and assisting others known and unknown to the Grand Jury, having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce, a firearm, to wit, a FEG Model PM 380 semiautomatic firearm, and ammunition, to wit approximately seven (7) rounds of .380 caliber ammunition, which had been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2), and Title 18, United States Code, Section 2.

COUNT TWELVE

Possession of a Firearm and Ammunition by a Convicted Felon

On or about June 27, 2015, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendant,

SHAWNA NICOLE ENLOE

aiding, abetting, and assisting others known and unknown to the Grand Jury, having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce, a firearm, to wit, a Smith & Wesson Model SW 380, and ammunition, to wit approximately six (6) rounds of .380 caliber ammunition, which had been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2), and Title 18, United States Code, Section 2.

COUNT THIRTEEN

Possession of a Firearm and Ammunition by a Convicted Felon

On or about September 11, 2015, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendant,

JOHN JACOB LAVERGNE

aiding, abetting, and assisting others known and unknown to the Grand Jury, having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce, a firearm, to wit, a .380 Rugar LCP pistol, and ammunition, to wit approximately six (6) rounds of .380 caliber ammunition, which had been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2), and Title 18, United States Code, Section 2.

COUNT FOURTEEN

**Using, Carrying, or Possessing a Firearm During
and in Relation to a Drug Trafficking Crime**

On or about June 16, 2015, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendant,

JOHN JACOB LAVERGNE

aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly use and carry a firearm, to wit, a FEG Model PM 380 semiautomatic firearm, during and in relation to a drug trafficking crime, that is, a violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A), as set forth in Counts One and Four of this Indictment, which are felonies prosecutable in a court of the United States, and did possess said firearm in furtherance of said crimes, in violation of Title 18, United States Code, Section 924(c)(1)(A), and

Title 18, United States Code, Section 2.

COUNT FIFTEEN

**Using, Carrying, or Possessing a Firearm During
and in Relation to a Drug Trafficking Crime**

On or about June 27, 2015, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendant,

SHAWNA NICOLE ENLOE

aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly use and carry a firearm, to wit, a Smith & Wesson Model SW 380, during and in relation to a drug trafficking crime, that is, a violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A), as set forth in Counts One and Six of this Indictment, which are felonies prosecutable in a court of the United States, and did possess said firearm in furtherance of said crimes, in violation of Title 18, United States Code, Section 924(c)(1)(A), and Title 18, United States Code, Section 2.

COUNT SIXTEEN

**Using, Carrying, or Possessing a Firearm During
and in Relation to a Drug Trafficking Crime**

On or about September 11, 2015, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the

defendants,

**JOHN JACOB LAVERGNE and
THEA RAE SONNIER**

aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly use and carry a firearm, to wit, a .380 Ruger LCP pistol, during and in relation to a drug trafficking crime, that is, a violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A), as set forth in Counts One and Nine of this Indictment, which are felonies prosecutable in a court of the United States, and did possess said firearm in furtherance of said crimes, in violation of Title 18, United States Code, Section 924(c)(1)(A), and Title 18, United States Code, Section 2.

COUNT SEVENTEEN

**Conspiracy to Use, Carry or Possess a Firearm During
and in Relation to a Drug Trafficking Crime**

On or about September 11, 2015, in the Houston Division of the Southern District of Texas, and elsewhere, and within the jurisdiction of this Court, the defendants,

**JOHN JACOB LAVERGNE and
THEA RAE SONNIER**

did knowingly combine, conspire, confederate, and agree, with persons known and unknown to the Grand Jury, to use and carry a firearm, to wit, a .380 Ruger LCP

pistol, during and in relation to a drug trafficking crime, that is, a violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A), as set forth in Counts One and Nine of this Indictment, which are felonies prosecutable in a court of the United States, and to possess said firearm in furtherance of said crimes, in violation of Title 18, United States Code, Sections 924(c)(1)(A) and (o), and Title 18, United States Code, Section 2.

NOTICE OF CRIMINAL FORFEITURE

(Title 21 U.S.C. § 853 and 18 U.S.C. § 924)

Pursuant to Title 21, United States Code, Section 853, as a result of the commission of a violation of 21 U.S.C. §§ 846, 841(a)(1), and 841(b)(1)(A), as set forth in Counts One through Nine of this Indictment, notice is given that the defendants,

**JOHN JACOB LAVERGNE,
SHAWNA NICOLE ENLOE,
THEA RAE SONNIER, and
ASHLEY DAFFT**

shall forfeit to the United States of America:

- (1) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation(s); and
- (2) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation(s).

Substitute Assets

In the event that the property which is subject to forfeiture to the United States, as a result of any act or omission of the defendant:

- (1) cannot be located upon exercise of due diligence;
- (2) has been placed beyond the jurisdiction of the Court;
- (3) has been transferred or sold to, or deposited with a third party;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of such property, pursuant to 21 U.S.C. § 853(p).

Moreover, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), the United States of America hereby gives notice that all firearms and ammunition involved in, or used in, the commission of the offense in violation of Title 18, United States Code, Sections 922 and 924 charged in Counts Ten through Seventeen is subject to forfeiture, including but not limited to a .45 Kimber handgun, and ammunition, to wit approximately seven (7) rounds of .45 caliber ammunition, a FEG Model PM 380 semiautomatic firearm, and ammunition, to wit approximately seven (7) rounds of .380 caliber ammunition, a Smith & Wesson Model SW 380, and ammunition, to wit approximately six (6) rounds of .380 caliber ammunition, and a .380 Ruger

LCP pistol, and ammunition, to wit approximately six (6) rounds of .380 caliber ammunition.

A TRUE BILL

ORIGINAL SIGNATURE ON FILE

FOREPERSON OF THE GRAND JURY

KENNETH MAGIDSON
United States Attorney

By:


SHARAD S. KHANDELWAL
Assistant United States Attorney